

### **REMARKS**

In view of the foregoing amendments and following remarks, reconsideration and allowance of this application are requested. Claims 1-11, 13-16, 31-50, 63-66, and 100 are pending, with claims 1, 10, and 100 being independent. Claims 1 and 10 have been amended by this reply to even more clearly emphasize the differences between the claimed subject matter and the art of record. Claim 100 has been added and claims 67-68, 70-74, 76-80, and 82-99 have been cancelled.

#### **35 U.S.C. § 103(a) Shaw / Gertler Rejection**

Claims 1-4, 9-11, 13-16, and 63-66 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaw et al., Microsoft Office 6-in-1, Que Corporation, 1994 ("Shaw") in view of Gertler, The Complete Idiot's Guide to Microsoft PowerPoint 97, Que Corporation 1996. This rejection is respectfully traversed.

Claim 1 recites, among other things, receiving a first portion of the multimedia document and beginning to render media content encapsulated within the file according to the choreography information associated with objects received before all objects of the file are received.

Shaw does not teach or suggest beginning to render media content encapsulated within the file according to the choreography information associated with objects received before all objects of the file are received, as recited in claim 1. Rather, Shaw describes features of Microsoft PowerPoint, which is a file-based program. As a file-based program, PowerPoint fails to teach or suggest beginning to render media content encapsulated within the file according to the choreography information associated with objects received before all objects of the file are received. Moreover, Microsoft PowerPoint is a file-based document format that does not display any representation of a PowerPoint document unless and until the entire PowerPoint file has been received. Shaw thus fails to teach or suggest the claimed method of beginning to render media content encapsulated within the file according to the choreography information before all objects of the file are received.

Gertler fails to remedy the deficiencies of Shaw with respect to claim 1 because, among other things, Gertler does not describe or suggest beginning to render media content encapsulated within the file according to the choreography information associated with objects received before all objects of the file are received, as recited in claim 1.

Similarly to claim 1, independent claim 10 recites beginning to render media content encapsulated within the file according to the choreography information associated with objects received before all objects of the file are received. As discussed with respect to claim 1, neither Shaw nor Gertler, alone or in combination, teach or suggest at least this feature of claim 10.

Claims 2-4, 9, 11, 13-16, and 63-66 each depend from one of claims 1 and 10 and are believed to be allowable for at least the reasons given for claims 1 and 10.

It is respectfully submitted that Shaw and Gertler, either alone or in combination, do not establish a *prima facie* case of obviousness with regard to claims 1-4, 9-11, 13-16, and 63-66. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

### **35 U.S.C. § 103(a) Shaw / Gertler / Caire et al. Rejection**

Claims 31-50 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaw in view of Gertler and U.S. Patent No. 5,663,962 ("Caire"). This rejection is respectfully traversed.

Claims 31-40 depend from claim 1. Claims 41-50 depend from claim 10. For that reason, the following remarks are directed primarily to features recited by claims 1 and 10.

Caire is directed to a method for multiplexing streams of audio-visual signals coded according to the MPEG1 standard. A time-division multiplexing process is used to construct a stream of packets, where each packet contains a single type of data. See Caire at col. 1, l. 65 to col. 2, l. 2. The Caire method involves building a single multiplexed stream from multiple individual elementary streams by continuously deciding, based upon the urgency that data is needed by a demultiplexing buffer, from which elementary stream to select data and form a packet so that the buffer does not become empty. See Caire at abstract; col. 1, ll. 37-45, 52-64; col. 2, ll. 3-9, 45-59; col. 4, l. 66 to col. 5, l. 7; Figs 1, 1A, 7A, 7B. In other words, Caire multiplexes data on the fly, making adjustments to the arrangement of a presentation based on

the communications channel and how full the demultiplexing buffers are at each instance of time.

Caire fails to remedy the deficiencies of Shaw and Gertler with respect to claims 1 and 10 because, among other things, Caire does not describe or suggest beginning to render media content encapsulated within the file according to the choreography information associated with objects received before all objects of the file are received, as recited in claims 1 and 10. Claims 31-50 thus are allowable by virtue of their dependency, as well as on their own merits.

It is respectfully submitted that Shaw, Gertler and Caire, either alone or in combination, do not establish a *prima facie* case of obviousness with regard to claims 51-50. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

#### **35 U.S.C. § 103(a) Shaw / Gertler / Ando Rejection**

Claims 7 and 8 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaw in view of Gertler, and further in view of U.S. Patent No. 5,600,826 to Ando ("Ando"). Claims 7 and 8 depend from claim 1. This rejection is respectfully traversed.

Ando is directed to a structured data processor for converting between sequential and tree structured data, including a structured data treating unit for editing data. See Ando at col. 4, ll. 25-43; col. 6, ll. 44-47. Ando fails to remedy the deficiencies of Shaw and Gertler with respect to independent claim 1. Claims 7 and 8 thus are allowable by virtue of their dependency, as well as on their own merits.

It is respectfully submitted that Shaw, Gertler and Ando, either alone or in combination, do not establish a *prima facie* case of obviousness with regard to claims 7 and 8. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

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Serial No. : 08/866,857  
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Page : 13 of 13

Attorney's Docket No.: 06975-124001 / Multimedia 15

**35 U.S.C. § 103(a) Shaw / Gertler / Johnson Rejection**

Claims 5 and 6 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Shaw in view of Gertler, and further in view of U.S. Patent No. 5,892,847 to Johnson ("Johnson"). Claims 5 and 6 depend from claim 1. This rejection is respectfully traversed.


Johnson is directed to a method and apparatus for compressing images, including an encoder that that created a file format that layers the compressed image. See Johnson at col. 4, ll. 30-49. Johnson fails to remedy the deficiencies of Shaw and Gertler with respect to independent claim 1. Claims 5 and 6 thus are allowable by virtue of their dependency, as well as on their own merits.

It is respectfully submitted that Shaw, Gertler and Johnson, either alone or in combination, do not establish a *prima facie* case of obviousness with regard to claims 5 and 6. Accordingly, reconsideration and withdrawal of this rejection are respectfully requested.

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Respectfully submitted,

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